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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CHRYSLER-DODGE-JEEP
ECODIESEL MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:17-md-02777-EMC

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND TIME TO
FILE JOINT PROPOSED
ELECTRONICALLY STORED
INFORMATION PROTOCOL**

WHEREAS, pursuant to the Court's Pretrial Order No. 12 (Docket No. 222) and
Amended Pretrial Order No. 12 (Docket No. 227), the Plaintiffs' Steering Committee, on behalf
of the consumer and reseller dealer class plaintiffs, the Department of Justice, on behalf of the
United States Environmental Protection Agency, and counsel for Defendants FCA US LLC, Fiat
Chrysler Automobiles N.V., V.M. Motori S.p.A., V.M. North America, Inc., Sergio Marchionne,

1 Robert Bosch, LLC, and Robert Bosch GmbH (collectively, “Defendants”) (jointly, “the Parties”)
2 are required to submit a joint proposed Electronically Stored Information (“ESI”) Protocol within
3 thirty (30) days of the entry of Pretrial Order No. 12;

4 WHEREAS, thirty (30) days from the entry of Pretrial Order No. 12 (Docket 222) is
5 October 28, 2017 and thirty (30) days from the entry of Amended Pretrial Order No. 12 (Docket
6 227) is November 1, 2017;

7 WHEREAS, the Parties have met and conferred, and exchanged drafts of the joint
8 proposed ESI Protocol;

9 WHEREAS, the Parties have reached agreement on a substantial portion of the issues
10 addressed by the joint proposed ESI Protocol; and

11 WHEREAS, due to the complexities of the technical issues involved with developing a
12 joint proposed ESI Protocol that completely and comprehensively addresses the issues involved,
13 the Parties require additional time to continue negotiations and finalize agreed terms;

14 IT IS THEREFORE STIPULATED AND AGREED by the Parties, subject to the Court’s
15 approval, as follows:

16 1. The deadline for the Parties to file their joint proposed ESI Protocol is November
17 14, 2017.

18 Dated: October 27, 2017

19 Respectfully submitted,

20 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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28 *Plaintiffs’ Lead Counsel and Chair of the Plaintiffs’ Steering
Committee*

1 Dated: October 27, 2017

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3 By: /s/ Robert J. Giuffra, Jr.
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10 *Counsel for Fiat Chrysler Automobiles N.V., FCA US LLC,*
11 *V.M. Motori S.p.A., V.M. North America, Inc., and Sergio*
Marchionne

12 Dated: October 27, 2017

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20 *Counsel for Robert Bosch LLC and Robert Bosch GmbH*

21 Dated: October 27, 2017

U.S. DEPARTMENT OF JUSTICE

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23 By: /s/ Leigh P. Rendé
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Government Coordinating Counsel

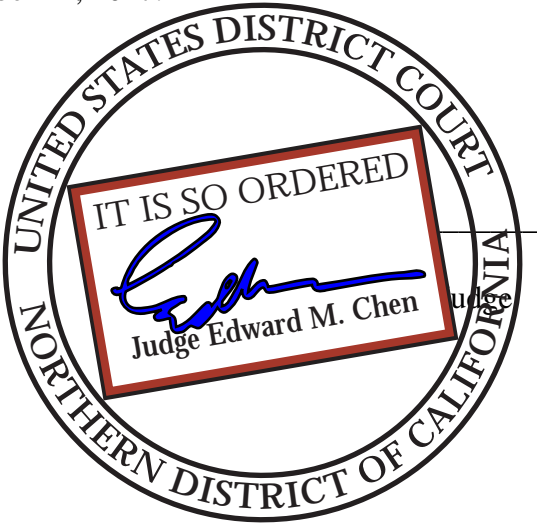
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~~PROPOSED~~ ORDER GRANTING STIPULATION TO EXTEND TIME

Based on the foregoing Stipulation, the Court GRANTS the Parties' Stipulation to Extend Time to File Joint Proposed Electronically Stored Information Protocol. The deadline for the Parties to file their joint ESI Protocol is November 14, 2017.

IT IS SO ORDERED.

DATED: 10/30, 2017



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ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: October 27, 2017

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 27, 2017, a true and correct copy of the foregoing was electronically filed and served electronically via the Court's CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser